

1 STEVEN G. KALAR
2 Federal Public Defender
3 ROBERT M. CARLIN
4 Assistant Federal Public Defender
5 160 West Santa Clara Street, Suite 575
6 San Jose, CA 95113
7 Telephone: (408) 291-7753
8 E-mail: robert_carlin@fd.org

EDS:SOA/AGB/BHE

9 Counsel for Defendant
10 RAMIRO MADRIZ-HERNANDEZ

11
12 IN THE UNITED STATES DISTRICT COURT
13 FOR THE NORTHERN DISTRICT OF CALIFORNIA
14
15 SAN JOSE DIVISION

16
17 UNITED STATES OF AMERICA,) No. CR 12-00762-DLJ
18 Plaintiff,) STIPULATION TO CONTINUE STATUS
19 vs.) CONFERENCE; [] ORDER
20 RAMIRO MADRIZ-HERNANDEZ ,)
21 Defendant.)

22 Plaintiff United States of America, by and through Special Assistant United States
23 Attorney Meredith Edwards, and Defendant RAMIRO MADRIZ-HERNANDEZ ("Mr.
24 Madriz"), by and through his attorney of record, Assistant Federal Public Defender Robert
25 Carlin, hereby stipulate that the status conference in this case should be continued from February
2: to March 28, 2013, at 9:00 a.m.

26 1. Mr. Madriz has been charged in the above captioned case in a single count indictment
with a violation of 8 U.S.C. §§ 1326 (a) and (b).

2. A status conference before this Honorable Court has been scheduled for February 2: ,
2013, at 9:00 a.m.

3. The United States has indicated that it will be charging Mr. Madriz with possession of

1 controlled substances with the intent to distribute, in violation of 21 U.S.C. § 841 (a)(1).

2 4. The government has provided discovery on the anticipated drug charges, and Mr.
3 Madriz needs additional time to review and discuss that discovery with counsel, and to explore
4 the possibilities of a consolidated disposition in the event that a pretrial resolution appears to be
5 an appropriate course.

6 5. Therefore, Mr. Madriz respectfully requests that the status hearing be continued as
7 requested, and agrees to the exclusion of time from February 21 to March 28, 2013, pursuant to
8 18 U.S.C. § 3161 (h)(7)(A).

9 5. Accordingly, the parties request that the status hearing be continued from February 2:
10 to March 28, 2013, at 9:00 a.m.

11

12 IT IS SO STIPULATED.

13

Respectfully submitted,

14

STEVEN G. KALAR
Federal Public Defender

15

16

/S/

17

Dated: February 19, 2013

ROBERT M. CARLIN
Assistant Federal Public Defender

18

19

UNITED STATES ATTORNEY

20

21

Dated: February 19, 2013

/S/

22

MEREDITH EDWARDS
Special Assistant United States Attorney

23

24

25

26

1 STEVEN G. KALAR
2 Federal Public Defender
3 ROBERT M. CARLIN
4 Assistant Federal Public Defender
5 160 West Santa Clara Street, Suite 575
6 San Jose, CA 95113
7 Telephone: (408) 291-7753
8 E-mail: robert_carlin@fd.org

6 Counsel for Defendant
RAMIRO MADRIZ-HERNANDEZ

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

UNITED STATES OF AMERICA,) No. CR 12-00762-DLJ
Plaintiff,) [] ORDER ON STIPULATION
vs.) TO CONTINUE STATUS CONFERENCE
RAMIRO MADRIZ-HERNANDEZ,)
Defendant.)

17 1. Mr. Madriz has been charged in the above captioned case in a single count indictment
18 with a violation of 8 U.S.C. §§ 1326(a) and (b)

19 2. A status conference before this Court has been scheduled for February 2: , 2013, at
20 9:00 a.m.

21 3. The United States has indicated that it will be charging Mr. Madriz with possession of
22 controlled substances with the intent to distribute, in violation of 21 U.S.C. § 841 (a)(1).

23 4. The government has provided discovery on the anticipated drug charges, and Mr.
24 Madriz needs additional time to review and discuss that discovery with counsel, and to explore
25 the possibilities of a consolidated disposition in the event that a pretrial resolution appears to be
26 an appropriate course.

1 5. The parties request that the status hearing be continued from February 21 to March 28,
2 2013, at 9:00 a.m.

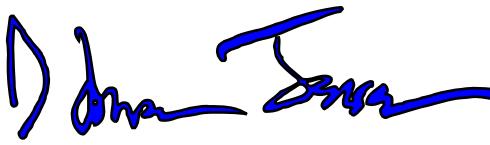
3 6. There is good cause for the requested continuance, and the “ends of justice” served by
4 taking such action “outweigh the best interest of the public and the defendant in a speedy trial.”
5 18 U.S.C. § 3161 (h)(7)(A). Accordingly, the time from February 2: to March 28, 2013, is
6 excluded pursuant to section § 3161 (h)(7)(A).

7 5. The status hearing in this matter shall be continued from February 2: to March 28,
8 2013, at 9:00 a.m.

9

10 IT IS SO ORDERED.

11 Dated: 02/27/13



HON. D. LOWELL JENSEN
United States District Judge

14

15

16

17

18

19

20

21

22

23

24

25

26